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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LAS VEGAS SUN, INC., a Nevada  
corporation,

Plaintiff,

v.

SHELDON ADELSON, et al.,

Defendants.

AND RELATED COUNTERCLAIMS

Case No. 2:19-cv-01667-ART-VCF

**JOINT STATUS REPORT PURSUANT TO  
ECF NO. 484**

Pursuant to the Special Master's October 4, 2021 Order re: Protocol for Resolving Discovery Disputes and Deposition Scheduling (ECF No. 484) ("Discovery Protocol"), the Parties hereby submit this Joint Status Report identifying the status of document and deposition discovery:

## **I. Status of Document Productions**

### **a. Defendants' Discovery Response/Production Obligations**

On November 16, 2022, the Court granted the Sun's objection regarding Defendants' responses to Interrogatory Nos. 14-15 (ECF No. 795). On January 17, 2023, Defendants supplemented their responses to Interrogatory Nos. 14-15 and produced documents Bates stamped DEFS0202010-37.

### **b. Defendants' Experts' Production Obligations**

On September 26, 2022, and January 23, 2023, the Sun served subpoenas for documents on Defendants' expert witnesses. Defendants' experts have made multiple document productions, including a production of rebuttal report documents on January 31, 2023. The Sun is in the process of reviewing this production.

### **c. The Sun's Experts' Production Obligations**

On September 23, 2022, and September 27, 2022, Defendants served subpoenas on the Sun's expert witnesses. The Sun has made multiple document productions, including a production of rebuttal report documents on January 31, 2023. Defendants are in the process of reviewing this production.

## **II. Status of Depositions**

### **a. Depositions Taken and Already Scheduled**

The parties have completed all fact depositions, and have scheduled the following expert depositions:

<b>Deponents</b>	<b>Deposing Party</b>	<b>Dates</b>
Kordalski, David	Defendants	February 28, 2023
Rainey, Mark	Plaintiff	March 9, 2023
Aldrich, Larry	Defendants	March 15, 2023
Picard, Robert	Defendants	March 21, 2023

Deponents	Deposing Party	Dates
Katz, Michael	Defendants	April 3, 2023
Gundlach, Greg	Defendants	April 6, 2023
Nolte, David	Plaintiff	April 10, 2023
Evans, David	Plaintiff	April 12, 2023
Gottlieb, Barbara	Defendants	April 18, 2023
Paulson, Ken	Plaintiff	April 20, 2023
Lamb, Russell	Defendants	April 27, 2023

DATED this 6th day of February 2023.

DATED this 6th day of February 2023.

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**PROOF OF SERVICE**

I hereby certify that on the 6th day of February, 2023, I served a true and correct copy of the foregoing **JOINT STATUS REPORT PURSUANT TO ECF NO. 484** via the United States District Court's CM/ECF electronic filing system to all parties on the e-service list.

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